

1 Thomas D. Neeleman, WSBA #33980  
1904 Wetmore Ave, Suite 200  
2 Everett, WA 98201

# The Honorable Thomas Glover Chapter 7 Proceeding

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

5 IN RE: ) Case No. 09-22675  
6 LINDA BODEN, )  
7 ) RESPONSE TO MOTION FOR  
8 ) RELIEF FROM STAY BY  
 ) JP MORGAN CHASE BANK

10           **COMES NOW** the debtor, Linda Boden (hereinafter referred to as "Debtor"), by and  
11 through the law firm of THOMAS D. NEELEMAN, ESQ., L.C., her Attorneys of Record, and  
12 pursuant to all applicable portions of United States Bankruptcy Code (U.S.C. Title 11) hereby  
13 objects to the **MOTION FOR RELIEF FROM THE AUTOMATIC STAY** filed previously  
14 by JP Morgan Chase Bank (hereinafter referred to as "Creditor"). The debtor bases this  
15 objection on the following:

1. The debtor requires additional time in order to meet with Counsel regarding her options.
  2. The debtor requests the stay remain in effect in order to allow the debtor time to meet with Counsel.
  3. The debtor requests the hearing on this matter be continued to February 10, 2010.

WHEREFORE, the debtor requests this court deny the relief from stay.

DATED January 21, 2010

THOMAS D. NEELEMAN, ESQ., L.C.

By: /s/ Thomas D. Neleman  
Thomas D. Neleman, WSBA, 33980  
Attorneys for Debtor

1  
2  
3  
4  
5  
6  
7  
8                   **MAILING CERTIFICATE**

9                   I hereby certify that on January 20, 2010, a copy of this Response to the Motion for  
10 Relief by JP Morgan Chase Bank was sent via ECF to James Miersma

11  
12                   /s/ Emilee Morzelewski  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

AFFIDAVIT OF NO RESPONSE - 1

27                   Thomas D. Neeleman  
28                   1904 Wetmore Ave, Suite 200  
                    Everett, WA 98201  
                    425-212-4800